

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

IN RE: CAPITAL ONE 360 SAVINGS  
ACCOUNT INTEREST RATE  
LITIGATION

Case No. 1:24-md-03111-DJN-WBP

**PLAINTIFFS' NOTICE OF COMPLIANCE WITH NOTICE PLAN REGARDING  
SETTLEMENT WEBSITE**

Class Counsel<sup>1</sup> respectfully submits this Notice to “confirm[] that all access and security issues regarding the Settlement Website have been resolved and that the website fully complies with the Notice Plan as originally presented to the Court,” as required by the Court’s Order (Ordering Notice of Compliance) dated September 17, 2025 (ECF 203, the “Order”).

On September 18, 2025, Class Counsel’s office emailed the Security Operations Center of the Administrative Office of the U.S. Courts (“AO SOC”), attaching a copy of the Order and advising that the Settlement Website established for this matter ([capitalone360savingsaccountlitigation.com](http://capitalone360savingsaccountlitigation.com)) was being blocked by AO SOC and therefore could not be accessed by any computer in the Federal Judiciary. AO SOC promptly investigated and responded by email later the same day, saying: “We have completed our analysis of the provided URL. Results from Virus Total, the domain profile, and Threat Grid all indicate that the website is legitimate. AO SOC has submitted an unblock request, and the URL is now accessible.” Both Special Master Seebald and Judge Novak’s law clerk were copied on this email correspondence, which can be filed or otherwise made available at the Court’s request.

Neither Class Counsel nor the Settlement Administrator, Epiq Class Action & Claims Solutions, Inc. (“Epiq”) are aware of any security deficiencies with the Settlement Website, nor of

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<sup>1</sup> All capitalized terms herein are defined within the Settlement Agreement, ECF 163-1.

any widespread or unresolved issues with any Settlement Class Members being unable to access the Settlement Website. As set forth in the previously submitted Declaration of Cameron R. Azari, Esq. Regarding Implementation and Adequacy of Notice Plan dated September 10, 2025 (ECF 199), the Settlement Website fully complies with the Notice Plan as originally presented to the Court, to wit:

As of September 8, 2025, there have been 899,996 unique visitor sessions to the Settlement Website, and 2,810,662 web pages have been presented.

The Settlement website was established with and maintains the correct SSL Certificate to ensure all data provided via the website is fully encrypted. In addition, the Settlement website is continuously monitored to confirm it is not down or unavailable for any reason. No outages have been detected for the [www.CapitalOne360SavingsAccountLitigation.com](http://www.CapitalOne360SavingsAccountLitigation.com) Settlement website throughout the notice and settlement administration process. In fact, the Settlement website has received a significant amount of traffic, likely due to publicity around the Settlement. On occasion, across the many cases Epiq administers, Epiq does sometimes receive input that an individual cannot access a specific settlement website. In those instances, Epiq suggests the following methods of troubleshooting (1) double checking there are no errors/typos in the website address; (2) clearing the browser cache and cookies, which may prevent a website from loading properly; (3) using a different internet browser, as some outdated browsers may have issues with loading a given website; (4) trying another device to determine if the issue is with the particular computer or phone; or (5) accessing the website through a different IP address. In our experience, these suggestions commonly resolve the issue.

*Id.* ¶¶ 19-20.

We appreciate the Court bringing this matter to our attention.

Dated: September 25, 2025

Respectfully submitted,

/s/ Matthew B. Kaplan

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